

AO 91 (Rev. 02/09) Criminal Complaint

United States Courts

Southern District of Texas

FILED

## UNITED STATES DISTRICT COURT

for the  
Southern District of Texas  
McAllen Division

December 01, 2018

David J. Bradley, Clerk of Court

United States of America )  
v. )  
Antonio RAMOS )  
(YOB: 1989, United States Citizen) )

Case No.

M-18-2462-M

*Defendant*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of November 30, 2018 in the county of Hidalgo in the Southern District of  
Texas, the defendant violated 18 U. S. C. § 554  
an offense described as follows:

It shall be unlawful for any person to fraudulently or knowingly export or send from the United States, or attempt to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receive, conceal, buy, sell, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: one hundred and twenty (120) rounds of .243 caliber ammunition, forty (40) rounds of .270 caliber ammunition, forty (40) rounds of 30-30 caliber ammunition, forty (40) rounds of .300 caliber ammunition, forty (40) rounds of 6.5 caliber ammunition, and forty (40) rounds of 7 mm caliber ammunition.

This criminal complaint is based on these facts:

See Attachment A.

☒ Continued on the attached sheet

/s/ Brian E. Garcia

*Complainant's signature*

Brian E. Garcia, HSI Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Submitted by reliable electronic means, sworn to and attested to electronically per Fed. R. Cr. P. 4.1, and probable cause found on

Date: December 1, 2018City and state: McAllen, Texas*Judge's signature*

J. Scott Hacker, U.S. Magistrate Judge

*Printed name and title*

## Attachment A

On November 30, 2018, United States Customs and Border Protection Officers (CBPOs) working the outbound travel lane at the Falcon Dam International Port of Entry (POE) in Falcon Heights, Texas, observed a silver Chevrolet Malibu enter the outbound travel lane and selected it for inspection. CBPOs identified the driver of the silver Chevrolet Malibu as Antonio RAMOS. A CBPO obtained a negative declaration for ammunition, firearms, and monetary instruments in excess of ten thousand United States dollars (\$10,000 USD) from RAMOS.

During the primary outbound inspection, CBPOs observed clothing under the spare tire located in the trunk; thus, CBPOs escorted RAMOS into the secondary inspection area. During the secondary inspection, CBPOs discovered eleven (11) boxes of assorted ammunition underneath the spare tire, which was concealed by the clothing. Upon further inspection, two (2) boxes of ammunition were discovered concealed behind the driver's side backseat, and three (3) boxes were also discovered concealed underneath the center console and radio system area.

The total amount of assorted ammunition was three hundred and twenty (320) rounds and consisted of the following: one hundred and twenty (120) rounds of .243 caliber ammunition, forty (40) rounds of .270 caliber ammunition, forty (40) rounds of 30-30 caliber ammunition, forty (40) rounds of .300 caliber ammunition, forty (40) rounds of 6.5 caliber ammunition, and forty (40) rounds of 7 mm caliber ammunition.

After notifying Homeland Security Investigations (HSI) Special Agents (SAs) of the situation, CPBOs proceeded to transport RAMOS to the Roma International POE in Roma, Texas for further processing. HSI SAs responded to the Roma International POE to conduct an interview of RAMOS. Prior to being interviewed, RAMOS was read and explained his rights as per Miranda in the English language by HSI SAs. RAMOS waived his right to have an attorney present and voluntarily provided a statement.

RAMOS admitted to knowing that smuggling ammunition from the United States was contrary to United States Law. RAMOS stated that he did have, nor has he ever applied for a license to export ammunition from the United States into Mexico. RAMOS admitted to hiding the ammunition to avoid detection by CBPOs.

Ammunition cannot be exported outside of the United States without a license in accordance with Title 22, United States Code Section 2778 and Title 22 of the Code of federal regulations. RAMOS does not possess a license to export ammunition.

Attachment A

/S/ Brian E. Garcia  
Complainant's Signature

Brian E. Garcia, HSI Special Agent  
Printed Name and Title

Sworn to before me and signed in my presence.

Date: December 1, 2018

  
Judge's Signature

J. Scott Hacker, U.S. Magistrate Judge  
Printed Name and Title

City and state: McAllen, Texas